

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CHINA EXPORT AND CREDIT
INSURANCE CORPORATION a/k/a
SINOSURE, and HEFEI REACHEVER
IMPORT AND EXPORT LTD.,

Petitioners,

- against -

API INTERNATIONAL GROUP, LLC,

Respondent.

ECF CASE

No. 7:23-cv-5549

**DECLARATION OF
AIMÉE SCALA IN SUPPORT OF
PETITION TO CONFIRM
ARBITRATION AWARD**

I, Aimée Scala, declare under penalty of perjury, that:

1. I am an attorney with the law firm Mazzola Lindstrom LLP, attorneys of record for China Export and Credit Insurance Corporation, a/k/a Sinosure, and Hefei Reachever Import and Export Ltd. (“Petitioners”). I am familiar with the facts, pleadings, and procedural history of this matter.

2. This declaration is respectfully submitted in support of Petitioners’ petition to confirm the arbitration award rendered on or about December 9, 2022 (“Award”) by the International Arbitral Tribunal of the International Centre for Dispute Resolution, the international division of the American Arbitration Association (the “Tribunal”) for in the proceeding captioned as API International Group, LLC against Hefei Reachever Import and Export Ltd. and China Export and Credit Insurance Corporation a/k/a Sinosure, a state-owned Chinese Export Credit Insurance Corporation, case number 01-20-0005-4078.

3. Annexed hereto as **Exhibit A** is the true and correct copy of the Award issued by the Tribunal in the above-captioned proceeding on December 9, 2022.

4. Annexed hereto as **Exhibit B** is the true and correct copy of the January 2, 2019 supply agreement.

5. Petitioners seek a judgment of confirmation of the Award in this Court so that they may proceed to enforce the Award.

6. The arbitration confirms to the requirements of Section 9 of the FAA, 9 U.S.C. § 9, governing confirmation of arbitration awards.

Dated: June 28, 2023



Aimée Scala